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9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN JR., NATHAN
13 ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
14 RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

15 Plaintiffs,

16 vs.

17 THE STATE OF NEVADA, EX REL. ITS
NEVADA DEPARTMENT OF
18 CORRECTION, and DOES 1-50,

19 Defendants.

Case No. 3:14-cv-00320-MMD-WGC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE FOR (1) FILING
DISPOSITIVE MOTIONS AND (2) FILING
AN OPPOSITION BRIEF TO
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT ON LIABILITY
FOR UNPAID WAGES UNDER THE FLSA
(SECOND REQUEST)**

20 Defendant, the State of Nevada, Ex. Rel. Its Nevada Department of Corrections ("NDOC"),
21 and Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt,
22 Timothy Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated
23 ("Plaintiffs"), by and through their respective counsel of record, hereby stipulate and agree to extend
24 the dispositive motion deadline by one week, from April 1, 2020 to **April 8, 2020**.

25 The Parties further stipulate and agree to extend the deadline for responding to Plaintiffs'
26 Motion for Partial Summary Judgment on Liability for Unpaid Wages Under the FLSA [ECF No.
27 256] by one week, from March 30, 2020 to **April 6, 2020**.

28 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the

1 requested extension due to the challenges of working remotely due to the COVID-19 crisis,
2 including slower connectivity, communications delays, and obtaining records necessary to the
3 motions.

4 Accordingly, the parties agree that the requested extension furthers the interest of this
5 litigation and is not being requested in bad faith or to delay these proceedings unnecessarily.

6 This is the parties' second request for extension of this deadline.

7 DATED this 30th day of March, 2020.

8 **WILSON, ELSER, MOSKOWITZ,**
9 **EDELMAN & DICKER LLP**

10 /s/ James T. Tucker

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15 Las Vegas, Nevada 89101
16 *Attorneys for Defendant*

17 DATED this 30th day of March, 2020.

18 **THIERMAN BUCK LLP**

19 /s/ Leah L. Jones

20 Mark R. Thierman, Esq., Nevada Bar No. 8285
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22 Leah L. Jones, Esq., Nevada Bar No. 13161
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24 Reno, Nevada 89511
25 *Attorneys for Plaintiffs*

26 **ORDER**

27 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

28 Dated this 30th day of March, 2020.



UNITED STATES DISTRICT JUDGE